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November 29, 2021

Honorable Andrew T. Baxter  
Federal Building and U.S. Courthouse  
P.O. Box 7396  
Syracuse, NY 13261-7396


**RE:** RE: 5:20-cv-00489-GTS-ATB Compagni v. Town of Cortlandville, et al.  
Request for discovery conference

Dear Judge Baxter:

I am writing this letter to advise Your Honor that the parties have encountered an apparent discovery impasse. Pursuant to Your Order, I am seeking judicial guidance prior to filing any non-dispositive motions. Since we last had our discovery conference virtually nothing has been accomplished except that opposing counsel has drafted their own Protective Stipulation, for which we have agreed to sign. With that regard, the only request we have is that simple language be added to the Stipulation that includes the Plaintiff's medical records as well as financial records be included in the Stipulation.

The Plaintiff is ready, willing and able to get discovery started in this case, but despite our multiple requests for deposition dates and now a simple request concerning the Plaintiff's medical records be included into the proposed Protective Stipulation, our requests are getting us nowhere. Thank you.

Respectfully,

  
Jesse P. Ryder

CC: Philip Gulisano (via Efile)